

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN THE MATTER OF THE SEARCH OF ) CASE NO.: 2:23-cr-888  
BAYMONT MOTEL, 1286 SNIDERS )  
HIGHWAY, ROOM 227, WALTERBORO, ) **(UNDER SEAL)**  
SOUTH CAROLINA, 29488 AS DETAILED )  
IN THE AFFIDAVIT OF ATF SPECIAL )  
AGENT ANTE BRUSICH, DATED OCTOBER )  
18, 2023 )

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the October 18, 2023, affidavit of ATF Special Agent Ante Brusich in support of the search warrant and the attachments thereto, as well as the return to the warrant identifying any evidence seized. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within this document and to avoid the disclosure of the investigation at this time.

Based on the facts in the affidavit, there is reason to believe that disclosure of the information in the documents would seriously jeopardize an ongoing investigation including by giving targets the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, or endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the affidavit, the attachments thereto, the return outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005).

Based on the foregoing, the Government requests that the affidavit in support of the search warrant and attachments thereto, as well as the return, be filed under seal except that working copies should be made available to the United States Attorney's Office, Bureau of Alcohol, Tobacco, Firearms and Explosives, and any other law enforcement agency designated by the United States Attorney's Office.

Respectfully Submitted,

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October 18, 2023